

# Exhibit 16

## 3505-17

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC.,  
MARKETING, SALES PRACTICES, AND  
PRODUCTS LIABILITY LITIGATION

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) Case No. 19-MD-02913-WHO  
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)  
) Volume III  
)  
) Pages 462 - 506  
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REMOTE VIDEOCONFERENCED VIDEOTAPED DEPOSITION OF QUARRY PAK,  
30(B)(6) witness for SAN FRANCISCO  
UNIFIED SCHOOL DISTRICT  
Remotely in San Francisco, California  
Tuesday, December 21, 2021

Reported by:  
ELIZABETH BORRELLI, CSR No. 7844, CCRR, CLR  
JOB NO. 203861

1 you're assistant principal or principal, it's part  
2 of your job to like enforce and implement and  
3 intervene.

4 Q. So just to clarify, the District -- for  
5 the reasons you said, the District is not able to  
6 identify specific costs associated with the  
7 mitigation efforts --

8 A. Not at this time.

9 Q. -- separate and apart from the state  
10 Department of Health funding?

11 A. Not at this time.

12 MR. OSBORNE: So if we could take a break  
13 now and go into breakout rooms, maybe take 15  
14 minutes, and we'll be back.

15 THE WITNESS: Sure.

16 THE VIDEOGRAPHER: Off the record. The  
17 time is 10:04.

18 (Recess.)

19 THE VIDEOGRAPHER: Back on the record.  
20 The time is 10:22.

21 MR. OSBORNE: Thank you, Ms. Pak, for your  
22 time this morning. That completes my examination  
23 for the 30(b)(6) as it relates to relief. And my  
24 understanding is that Ms. Gordon does not have  
25 questions at this time.